

MICHAEL D. MURPHY
mdmurphy@foxrothschild.com
FOX ROTHSCHILD LLP
Constellation Place
10250 Constellation Boulevard, Suite 900
Los Angeles, California 90067
Telephone: 310.598.4150
Facsimile: 310.556.9828

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SHAKEY'S PIZZA ASIA VENTURES,
INC, a Philippines corporation,

Plaintiff,

V.

PCJV USA, LLC, a Delaware limited liability company; PCI TRADING, LLC, a Delaware limited liability company; GUY KOREN, an individual; POTATO CORNER LA GROUP, LLC, a California limited liability company; NKM CAPITAL GROUP, LLC, a California limited liability company; J & K AMERICANA, LLC, a California limited liability company; J&K LAKEWOOD, LLC, a California limited liability company; J&K VALLEY FAIR, LLC, a California limited liability company; J & K ONTARIO, LLC, a California limited liability company; HLK MILPITAS, LLC, a California, limited liability company; GK CERRITOS, LLC, a California, limited liability company; J&K PC TRUCKS, LLC, a California limited liability company; and, GK CAPITAL GROUP, LLC, a California limited liability company and DOES 1 through 100, inclusive,

Defendants.

Case No. 2:24-CV-04546-SB(AGRx)

Hon. Stanley Blumenfeld

**DECLARATION OF MICHAEL
MURPHY CERTIFYING
COMPLIANCE WITH
L.R. 83 - 2.3.5**

Date: February 28, 2025

Time: 8:30 a.m.

Courtroom: 6C

Complaint Filed: May 31, 2024

Trial Date: August 4, 2025

1 PCJV USA, LLC, a Delaware limited
2 liability company; PCI TRADING LLC,
3 a Delaware limited liability company;
4 POTATO CORNER LA GROUP LLC,
5 a California limited liability company;
6 GK CAPITAL GROUP, LLC, a
California limited liability company;
NKM CAPITAL GROUP LLC, a
California limited liability company; and
GUY KOREN, an individual,

7 Counter-Claimants,

8 v.

9 SHAKEY'S PIZZA ASIA VENTURES,
INC, a Philippines corporation,

10 Counter Defendant.

11
12 PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING LLC,
a Delaware limited liability company;
POTATO CORNER LA GROUP LLC,
a California limited liability company;
GK CAPITAL GROUP, LLC, a
California limited liability company;
NKM CAPITAL GROUP LLC, a
California limited liability company; and
GUY KOREN, an individual,

13
14 Third Party Plaintiffs,

15 v.

16
17 PC INTERNATIONAL PTE LTD., a
Singapore business entity; SPAVI
INTERNATIONAL USA, INC., a
California corporation; CINCO
CORPORATION, a Philippines
corporation; and DOES 1 through 10,
inclusive,

18
19 Third Party Defendants.

DECLARATION OF MICHAEL D. MURPHY

I, Michael D. Murphy, declare as follows:

1. From inception of this case through today, and continuing forward, I have represented Plaintiff Shakey's Pizza Asia Ventures, Inc. ("SPAVI.") in this matter. During this period, up through last week, I have also been a Partner at Ervin, Cohen & Jessup, LLP, counsel of record.

2. This week, I moved my practice to Fox Rothschild, LLP, where I am, as of today, a Partner in its Century City office. Nevertheless, I remain counsel for SPAVI and will be the lead attorney in this action through trial. My representation has not changed.

3. Although the specific attorney serving as lead counsel for SPAVI in this matter is not changing, the firm serving as counsel of record, has. Accordingly, so as to ensure that Ervin, Cohen & Jessup is formally relieved of all obligations, and to enter Fox Rothschild's appearance, and identify my new firm's address and contact information as a matter of record, today, I caused to be filed a "Request for Approval of Substitution or Withdrawal of Counsel."

4. I have reviewed this Court's Order, entered at 1:10 pm today, and identified in Dkt. 114. In compliance with that Order, I hereby certify, attest, and represent, unequivocally, that my move to Fox Rothschild, and my substitution of my new firm, in place of Ervin, Cohen & Jessup will not be the source of, nor cause, any delay in this case. Local Rule 83-2.3.5 shall not be violated because of this substitution.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 27th day of February 2025, in Los Angeles, California

/s/ Michael D. Murphy

Michael D. Murphy (Cal. SBN 224678)

CERTIFICATE OF SERVICE

The undersigned certifies that, on February 28, 2025, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court, Central District of California, using the Court's ECF filing system. I further certify that all counsel for all parties to this action are registered CM/ECF user and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: February 27, 2025

Fox Rothschild LLP

/s/ Michael D. Murphy
Michael D. Murphy
Attorneys for Plaintiff SHAKEY'S
PIZZA ASIA VENTURES, INC.